Appln. No.: 09/465,879

Amendment dated September 16, 2005 Reply to Office Action of June 20, 2005

## **REMARKS/ARGUMENTS**

The office action of June 20, 2005 has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested. Claims 1, 4, 9, 12, 22, 27 and 29-34 remain pending in this application. New claims 35-40 have been added.

Claims 1, 9, 22, 27, 33 and 34 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. patent no. 5,463,725 to Henckel et al. ("Henckel"). Claims 29 and 31 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Henckel. Claims 4, 12, 30 and 32 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Henckel in view of U.S. patent no. 6,407,757 to Ho. Applicants respectfully traverse these rejections.

The action alleges that <u>Henckel</u> shows all the features of independent claims 1, 9 and 33. To show the claim 1 and 9 steps of associating navigational functionality with a page number of the immersive reading page, the page number having a corresponding interactive region and displaying another immersive reading page of the electronic document in response to the user selecting the interactive region corresponding to the page number of the immersive reading page, the action points to col. 2, lines 51-66 of <u>Henckel</u>. The action relies on the same portion of <u>Henckel</u> to the show the claim 33 features of associating navigational functionality with an element of the immersive reading page, the element having a corresponding interactive region, and displaying another immersive reading page of the electronic document in response to the user selecting the interactive region corresponding to the element of the immersive reading page.

According to <u>Henckel</u>, referring to Fig. 2 and col. 2, a right hand electronic page (page 103) is being turned to expose pages 104 and 105; to turn to electronic pages 104 and 105, the user touches the display device 10 with his hand somewhere on page 103 (anywhere on the page is suitable) and drags his hand to the left across the face of the display device emulating the act of turning a physical page. In contrast to associating navigational functionality with a page number of the immersive reading page as recited in claims 1 and 9, <u>Henckel</u> associates navigational functionality with the entire immersive reading page and not a particular element, e.g., a page number, of the immersive reading page. Moreover, in <u>Henckel</u> no element of the immersive reading page, much less the page number has an interactive region, the entire page is

Appln. No.: 09/465,879

Amendment dated September 16, 2005 Reply to Office Action of June 20, 2005

interactive! With the invention of claims 1, 9 and 33 others types of enhanced functionality may be associated with other elements of the reading page (e.g., title line, text, etc.), which can have their own corresponding interactive regions. However, in <u>Henckel</u> since the page turning functionality is associated with the entire immersive reading page and the interactive region encompasses the entire page, the ability to provide enhanced functionality associated with elements of the immersive reading page cannot be realized. Moreover, as necessarily follows from the above, <u>Henckel</u> does not display another immersive reading page of the electronic document in response to the user *selecting the interactive region corresponding to a page number (claims 1 and 9) or even broadly speaking an element (claim 33)* of the immersive reading page.

For at least the above reasons, <u>Henckel</u> does not teach or suggest all the elements of claims 1, 9 and 33. Claims 22, 27, 29, 31 and 34, which directly depend from one of claims 1, 9 and 33, are patentably distinct from <u>Henckel</u> for at least the same reasons as their ultimate base claim, and further in view of the additional advantageous recited therein.

Claims 4, 12, 30 and 32 directly depend from one of claims 1 and 9. Notwithstanding the propriety of combining <u>Henckel</u> and <u>Ho</u>, the combination does not result in the inventions of claims 4, 12, 30, and 32 because <u>Ho</u> fails to cure the deficiencies of <u>Henckel</u> discussed above with respect to claims 1 and 9. For at least this reason, claims 4, 12, 30 and 32 are patentably distinct from the applied art.

New claims 35-40 are fully supported by the specification and believed allowable over the art of record.

Appln. No.: 09/465,879

Amendment dated September 16, 2005 Reply to Office Action of June 20, 2005

## **CONCLUSION**

It is believed that no fee is required for this submission. If any fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicit prompt notification of the same.

Respectfully submitted,

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